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March 13, 2024

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VIA ECF

Honorable Zahid N. Quraishi, U.S.D.J.
Honorable Tonianne J. Bongiovanni, U.S.M.J.
United States District Court for the District of New Jersey
Clark S. Fisher Building
402 East State Street
Trenton, New Jersey 08608

Re: Andy Kim, et al. v. Hanlon, et al.
Civil Action No. 3:24-cv-01098-ZNQ-TJB

Dear Judge Quraishi:

As Your Honor may be aware, this office represents the interests of the Defendant, Mercer County Clerk, Paula Sollami Covello, in the above referenced matter. By way of this correspondence, the Mercer County Clerk joins in both the letter filed by Rajiv D. Parikh (ECF 98) and Mark Natale (ECF 101) identifying both discovery disputes and a request for a discovery dispute conference in this matter.

Despite months of lead time for the Plaintiffs to prepare their filings and obtain numerous “expert” reports to support their position in this matter, Plaintiffs have refused to turn over pertinent and highly relevant documents and information to the Defendants so that a full defense can be put forward. This information gets to the very heart of the issue – is the emergent nature of

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RAINONE COUGHLIN MINCHELLO

March 13, 2024

Page 2

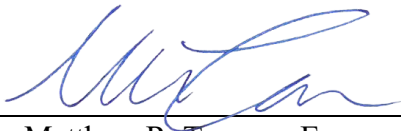
their claims of their own doing? It appears to be so, but Plaintiffs have opted to hide the ball without any legal basis articulated.

Without giving Defendants the opportunity to obtain this information and test the veracity of their claims, Plaintiffs are strategically hoping for a one-sided affair. This does not serve any interest but their own. Plaintiffs should not reap the benefits of placing Defendants between the proverbial rock and a hard place.

Accordingly, we join in counsel's request for a conference with the Court regarding these discovery disputes.

Respectfully submitted,

RAINONE COUGHLIN MINCHELLO, LLC

By: 
Matthew R. Tavares, Esq.

Cc: All counsel via ECF